

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

In the matter of  
THE CITY OF  
DETROIT, MICHIGAN

Case No. 13 53846 swr  
HONORABLE STEVEN W. RHODES

INDIVIDUAL / CREDITOR / CLAIMANT HEIDI PETERSON'S  
DISCOVERY REQUESTS

These discovery requests are directed to the appropriate persons through the attorneys for the Chapter 9 debtor, David Heiman at Jones Day, Attorneys at Law, 901 Lakeside Avenue, Cleveland, Ohio 44114.

Having been apprised that The Court will allow a maximum of six hours for deposition the various requests below and follow up questions based on each depending upon how they are answered would be directed at the following deponents: Kevin Orr, the emergency financial manager; members of the board who review city of Detroit and county of Wayne property taxes; the federal judge who dismissed Peterson's earlier case involving her losses suffered at the hands of an unfettered squatter allowed by the city to damage Peterson and her property and to get away with it unpunished; Detroit news writers; decisions makers at the water board; expert witness who would show that the city never made a good faith effort to bargain with its creditors in order to reach settlements.

REQUESTS FOR PRODUCTION

Please produce whatever internal memoranda were circulated in the state for the approval of the emergency financial manager particularly those memoranda showing what was expected by the state from the emergency financial manager and how the state was to benefit by the appointment of an emergency financial manager.

Please show on paper why you cannot sell city property assets, art assets, and other items of value and by doing so emerge from debt.

REQUESTS FOR ADMISSION

Please admit that homeowner Peterson made efforts to resolve her problems with the city but that city personnel either ignored Peterson or went out of their way to not deal with Peterson in good faith.

Please admit that the state all along was interested in moving Detroit quickly into bankruptcy for the reason that it was in the STATE'S BEST INTEREST for Detroit to be in bankruptcy.

Please admit that the state lottery money allegedly earmarked for Detroit schools never reaches Detroit schools and that it is common practice in Lansing to ignore Detroit's interests.

Please admit that persons are taxed according to their apparent ability to pay rather than the value of their property and that such a system results in squatters living for free and homeowners carrying the burden by paying higher tax rates.

### INTERROGATORIES

Why do city workers ignore the people who come to them during the work day and ask for city services?

How can the city rationalize paying for eight hours work while employees do not work eight hours?

Where has the city placed the evidences of the master list of property demolition and who decides which properties will be demolished first?

Why is the city so interested in partnering up with private interests to bulldoze downtown Detroit residences and create complexes benefiting private interests and paid for by taxpayer dollars.?

Isn't it true that the downtown development authority is a ruse set up to make money for private interests and at no benefit to the city?

Why are houses sold and resold to unsuspecting persons after the houses are stripped of their value and left to rot?

Why does the City allow squatters to live unfettered in houses when the owners of the houses attempt to remove the squatters?

Why do police fail to respond to calls particularly when the calls involve gangs threatening homeowners in their own homes?

How is it possible for someone to get water turned on without going through the proper procedures set forth by the water department? How are squatters allowed to turn water on? Why?

Are city employees free to do whatever they want and to not follow internal rules? Do city jobs require no obedience to any orders?

Do city employees trump their bosses powers? Is a city job guaranteed for life so that no work need ever be performed?

How does the city plan on making its non workers work at the close of a chapter 9 bankruptcy? What will make a non working city worker now decide to work?

How much money does the city lose by virtue of paying people to work but then not getting work from the people?

What safeguard exist to prevent skillful crooks from preying on unsuspecting buyers of properties?

What ways could the city keep its house buyers safe from super sophisticated squatters? Their move in scams? Their stay moved in scams? Their scams to steal personal property and damage real property? Their post moving out gang raids on houses they lived in then squatted in?

Why are squatters favored over homeowners? Why are persons of national origin not American treated with no respect whatsoever when it comes to their buying properties in the city?

What is the old master plan to keep certain persons from owning property? What new master plan will follow the chapter 9 to keep certain persons from buying property?

How is it that the owner of a once elegant mansion now in great need of repair whose high end value approached one hundred six thousand dollars but which said mansion now could not be sold for even thirty thousand dollars can be made to pay taxes on the mansion as if the mansion were still worth the original one hundred six thousand dollars?

Why is Detroit real estate so oddly handled that its sale benefits neither buyer nor seller, that the city loses whenever it changes hands, that the city loses when it is not sold, and that the city cannot even make money taxing it?

Since the city during the pending chapter 9 bankruptcy is governed in every way by the bankruptcy judge, bankruptcy statutes, bankruptcy rules, and the department of justice through the office of the united states trustee, why cant the emergency financial manager be withdrawn forthwith, his services having ended with the filing of the instant bankruptcy?

What possible tasks can the emergency financial manager now perform when his powers emanated from the governor and his goal to take Detroit into bankruptcy has been achieved?

Why will Detroit be able to strip itself of obligations to persons damaged by its employees?

How will the Detroit emerging from a chapter 9 in any way benefit the citizens it damaged prior to entering the chapter 9?

Why did the city make no effort to negotiate with individuals who sued the city? Is it the city's policy to go into lawsuits against its citizens rather than to try to work things out with its citizens? Wouldn't the city save a lot of money by paying attention to its citizenry rather than fighting its citizenry?

Dated: 8/23/2013

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